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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

J.M. and I.M., minors by and through their natural
parent and guardian, JESSICA HARGROVE,

Plaintiffs,

vs.

ANDREA HERNANDEZ; WALDO
HERNANDEZ; ANITA MOODY; LISA
BROCHU; KIM KALLAS; LISA RUIZ-LEE;
PAULA HAMMACK; DOE Individuals I-X;
ROE CLARK COUNTY DEPARTMENT OF
FAMILY SERVICES EMPLOYEES XI-XX,
individually and in their official capacities;
COUNTY OF CLARK, a political subdivision of
the State of Nevada; and ZOE CORPORATIONS
XXI-XXX,

Defendants.

CASE NO.: 2:14-cv-01197-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND DUE DATE FOR PLAINTIFF'S
OPPOSITION TO DEFENDANT LISA
BROCHU'S MOTION FOR SUMMARY
JUDGMENT**

Pursuant to FRCP 6 and FRCP 26, the parties, by and through their respective counsel of
record, hereby stipulate and agree to jointly move this Court for an Order to:

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1 1. Extend the due date for Plaintiff's Opposition to Defendant Lisa Brochu's Motion for
2 Summary Judgment from 09/18/15 to 09/25/15.

3 2. Extend the due date for Defendant's Reply to Plaintiff's Opposition from 9/29/15 to
4 10/6/15.

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6 The Motion for summary judgment for Defendant Lisa Brochu was originally filed on
7 August 25, 2015. This extension is requested as this Opposition involves a complicated legal
8 matter, and the attorney previously assigned to this case, JASON LATHER, ESQ., no longer works
9 for the law firm of GANZ & HAUF. Additionally, Mr. Lather's paralegal is no longer with the law
10 firm of Ganz & Hauf. There has been a transition within his department, and it has taken Mr.
11 Lather's replacement time to familiarize and catch up on his cases and assignments.

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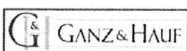
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Therefore, Plaintiff respectfully requests that this honorable Court grant the parties stipulation to extend the due date for Plaintiff's Opposition to Defendant Lisa Brochu's Motion for Summary Judgment to 9/25/2015.

DATED this __ day of September, 2015.

DATED this __ day of September, 2015.

GANZ & HAUF

KOLESAR & LEATHAM

/s/ Adam Ganz

/s/ Jonathan Blum

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Attorney for Defendant, Lisa Brochu

ORDER

This matter having been stipulated to by the parties, through their respective counsel, and the Court being otherwise duly advised;

IT IS HEREBY ORDERED that the Due Date for Plaintiff's Opposition to Defendant Lisa Brochu's Motion for Summary Judgment will be extended from September 18, 2015 to September 25, 2015, and extend the due date for Defendant's Reply to Plaintiff's Opposition from September 29, 2015 to October 6, 2015.

Dated: September 22, 2015.


UNITED STATES DISTRICT JUDGE